

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

TONYA CHERYL MOSES,

Plaintiff,

VS.

ALLSTATE INSURANCE COMPANY,
EDDIE WATTS, DEXTER WALDEN,
fictitious defendants A, B, C, D, and E,
being those persons, companies,
partnerships, or other entities who caused
or contributed to cause the injuries and
damages alleged herein through their
negligent and/or intentional conduct and/or
who are the successors in interest to any of
named Defendants and/or who had
supervisory control or the duty to supervise
any of the named Defendants and F, G, H, I
and J, said fictitious defendants being those
corporations, partnerships, other business
entities or other individuals who conspired
with the named Defendants to further the
conduct described in the complaint and/or
who acted either independently or
participated with others to commit the
wrongful conduct complained of herein,
whose name or names are unknown to the
Plaintiff at this time but which will be
substituted by amendment when
ascertained,

Defendants.

Case No.: CV-__

AFFIDAVIT OF EDDIE WATTS

Before me, the undersigned authority, on this date personally appeared Eddie Watts who,
being by me first duly sworn, deposes and says based upon personal knowledge:


00979985.1/1050-0230



1. My name is Eddie Watts. I am over the age of nineteen and I reside in Shelby County, Alabama.
2. I am currently employed as a claim adjuster for Pilot Catastrophe Inc., in Mobile, Alabama. Pilot Catastrophe Services, Inc., my employer, was retained by Allstate Insurance Company "Allstate" to assist in adjusting a claim involving a loss which occurred in September of 2004, at the residence of Tonya Moses at 601 14th Ave. South, Phenix City, AL 36869.
3. I am not, nor have I ever been an employee of Allstate. Additionally, I have not been trained and do not have any personal knowledge of the manner of which Allstate adjusts claims.
4. I have reviewed the complaint which has been filed by the plaintiff in this case and I do not, nor have I ever had any personal knowledge of any relationship between Allstate and McKinsey & Company.
5. I have had no involvement whatsoever in any relationship between Allstate and McKinsey & Company. I do not now, nor have I ever had any information concerning Allstate's development of adjusting processes and procedures and I do not know what role, if any, McKinsey & Company may have played in that process. I simply have no knowledge concerning the identity or role of McKinsey & Company.
6. I have never been involved or had any personal knowledge regarding any claim handling process known as Core Claims Process Redesign "CCPR" or any gaming strategy known as a Zero Sum Game Theory in regards to the adjustment of losses.

I have never been trained or provided with any documents or literature concerning "CCPR." Moreover, I had no role whatsoever in the creation or implementation of the CCPR process. I am not familiar with any practice of Allstate tying compensation for adjusters to the amount of money paid out in claims or adjusters receiving more compensation for the less they pay on a claim, and to my knowledge I have not, nor have I ever received compensation based on the amount of money Allstate pays on a claim. I have no knowledge concerning whether or not Allstate employed Tech-Cor. I am not familiar with "Tech-Cor," nor have I been trained concerning its identify or application to the adjusting process. Quite simply, I am not familiar with the terms "CCPR," "Tech-Cor," "Zero Sum Game," or any decision to utilize any consultants by Allstate Insurance Company.

7. I have no personal knowledge regarding Allstate's litigation tactics or any decisions made concerning the posture or resolution of any ongoing lawsuits with Allstate. Additionally, I have no knowledge regarding Allstate's choices when confronted with lawsuits.
8. I have no contractual relationship whatsoever with Plaintiff, Tonya Cheryl Moses. In addition, I was not responsible for the decision to accept or deny the claim of Tonya Cheryl Moses. Instead, I was responsible for investigating and adjusting the claim in question and providing information to Allstate for further review and consideration.


Edward Watts

VERIFICATION

STATE OF ALABAMA)
)
COUNTY OF SHELBY)

EW
SP Before me, the undersigned, a notary public in and for said county in said State, personally appeared Edward Watts, who is known to me and who being first duly sworn, deposes and says that she has personal knowledge of the facts set forth in the foregoing affidavit and that all such matters are true and correct to the best of her knowledge.

Subscribed and sworn before me this 14 day of December, 2005.



Linda Perry

NOTARY PUBLIC
My Commission Expires: May 18 2009